

**WOLF, RIFKIN, SHAPIRO, SCHULMAN &
RABKIN, LLP**

Don Springmeyer
Nevada Bar No. 1021
Bradley S. Schrager
Nevada Bar No. 10217
Justin C. Jones
Nevada Bar No. 8519
3556 E. Russell Road, Second Floor
Las Vegas, Nevada 89120
(702) 341-5200/Fax: (702) 341-5300
dspringmeyer@wrslawyers.com
bschrager@wrslawyers.com
jjones@wrslawyers.com

(Additional counsel appear on signature page)

*Attorneys for Individual and Representative Plaintiffs
Cung Le, Nathan Quarry, Jon Fitch, Luis Javier
Vazquez, Dennis Lloyd Hallman, Brandon Vera,
Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle
Kingsbury and Darren Uyenoyama*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Cung Le, Nathan Quarry, Jon Fitch, on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

Defendant.

Lead Case No.: 2:15-cv-01045-RFB-
(PAL)

Member Case Nos.:

2:15-cv-01046-RFB-(PAL)

2:15-cv-01055-RFB-(PAL)

2:15-cv-01056-RFB-(PAL)

2:15-cv-01057-RFB-(PAL)

**STIPULATION TO FILE A
CONSOLIDATED AMENDED
COMPLAINT AND TO EXTEND
DEFENDANT ZUFFA, LLC'S DEADLINE
TO ANSWER PLAINTIFFS'
CONSOLIDATED AMENDED
COMPLAINT ACCORDINGLY**

(First Request)

1 Luis Javier Vazquez and Dennis Lloyd
2 Hallman, on behalf of themselves and all
others similarly situated,

3 Plaintiffs,

4 v.

5 Zuffa, LLC, d/b/a Ultimate Fighting
6 Championship and UFC,

7 Defendant.

Case No. 2:15-cv-01055 RFB-(PAL)

8 Brandon Vera and Pablo Garza, on behalf of
9 themselves and all others similarly situated,

10 Plaintiffs,

11 v.

12 Zuffa, LLC, d/b/a Ultimate Fighting
13 Championship and UFC,

14 Defendant.

Case No. 2:15-cv-01056 RFB-(PAL)

15 Gabe Ruediger and Mac Danzig, on behalf of
16 themselves and all others similarly situated,

17 Plaintiffs,

18 v.

19 Zuffa, LLC, d/b/a Ultimate Fighting
20 Championship and UFC,

21 Defendant.

Case No. 2:15-cv-01057 RFB-(PAL)

22 Kyle Kingsbury and Darren Uyenoyama, on
23 behalf of themselves and all others similarly
situated,

24 Plaintiffs,

25 v.

26 Zuffa, LLC, d/b/a Ultimate Fighting
27 Championship and UFC,

28 Defendant.

Case No. 2:15-cv-01046 RFB-(PAL)

1 Plaintiffs, Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Hallman,
2 Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury and Darren
3 Uyenoyama, and Defendant Zuffa, LLC (collectively, “the Parties”) file this Stipulation To File A
4 Consolidated Amended Complaint And To Extend Defendant Zuffa, LLC’s Deadline to Answer
5 Plaintiffs’ Consolidated Amended Complaint Accordingly.

6 On September 25, 2015, the Court held a hearing on Zuffa’s Motions to Dismiss each of
7 Plaintiffs’ five substantively identical complaints. On September 27, 2015, Minute Orders were
8 entered denying Zuffa’s Motions to Dismiss each of Plaintiffs’ five complaints. *Le* Dkt. 186,
9 *Vazquez* Dkt. 77, *Vera*, Dkt. 76, *Ruediger* Dkt. 52, *Kingsbury* Dkt. 48.

10 On October 12, 2015, the parties filed a Stipulation to Extend Defendant Zuffa, LLC’s
11 Deadline To Answer Plaintiffs’ Complaints which the Court has not yet ruled upon. (Dkt. 191.)

12 To promote efficiency, the parties further agree that within thirty (30) days of the entry of
13 an Order approving this Stipulation by the Court, Plaintiffs may file a Consolidated Amended
14 Complaint that consolidates each of the five complaints in *Le*, *Vazquez*, *Vera*, *Ruediger*, and
15 *Kingsbury* into a single consolidated complaint. At this time, Plaintiffs do not seek leave to make
16 substantive changes to the allegations in the proposed Consolidated Amended Complaint, but
17 may reduce the total number of proposed representative plaintiffs.

18 The Parties further agree that Zuffa may have thirty (30) days from the filing of the
19 Consolidated Amended Complaint to file a consolidated Answer to the Plaintiffs’ proposed
20 Consolidated Amended Complaint. Accordingly, the parties request that the Court deny as moot
21 the Stipulation to Extend Defendant Zuffa, LLC’s Deadline To Answer Plaintiffs’ Complaints
22 (Dkt. 191), and in lieu thereof enter an Order approving the instant Stipulation To File A
23 Consolidated Amended Complaint And To Extend Defendant Zuffa, LLC’s Deadline to Answer
24 Plaintiffs’ Consolidated Amended Complaint Accordingly. The extension will not alter the date
25 of any event or deadline already fixed by Court order. This is the Plaintiffs’ first request to file a
26 consolidated amended complaint and Zuffa’s second request for an extension of time with regard
27 to its Answers.

DATED: October 21, 2015

/s/ Michael Dell' Angelo

Michael Dell' Angelo

Eric L. Cramer

Patrick Madden

BERGER & MONTAGUE, P.C.

1622 Locust Street

Philadelphia, PA 19103

Telephone: (215) 875-3000/Fax: (215) 875-4604

ecramer@bm.net

mdellangelo@bm.net

pmadden@bm.net

WOLF RIFKIN SHAPIRO SCHULMAN &
RABKIN, LLP

Don Springmeyer

Nevada State Bar No. 1021

Bradley Schrager

Nevada State Bar No. 10217

Daniel Bravo

Nevada State Bar No. 13078

3556 East Russell Road, Second Floor

Las Vegas, NV 89120

Telephone: (702) 341-5200

Fax: (702) 341-5300

COHEN MILSTEIN SELLERS & TOLL, PLLC

Benjamin D. Brown

Richard A. Koffman

Hiba Hafiz

1100 New York Ave., N.W., Ste. 500, East Tower
Washington, DC 20005

Telephone: (202) 408-4600/Fax: (202) 408 4699

bbrown@cohenmilstein.com

rkoffman@cohenmilstein.com

hhafiz@cohenmilstein.com

JOSEPH SAVERI LAW FIRM, INC.

Joseph R. Saveri

Joshua P. Davis

Matthew Weiler

Andrew M. Purdy

Kevin E. Rayhill

505 Montgomery Street, Suite 625

San Francisco, California 94111

Telephone: (415) 500-6800/Fax: (415) 395-9940

jsaveri@saverilawfirm.com

DATED: October 21, 2015

/s/ John F. Cove, Jr.

JOHN F. COVE, JR.

(Pro Hac Vice granted)

(jcove@bsfllp.com)

BOIES, SCHILLER & FLEXNER LLP

1999 Harrison Street, Suite 900

Oakland, CA 94612

Telephone: (510) 874-1000

Fax: (510) 874-1460

WILLIAM A. ISAACSON

(Pro Hac Vice granted)

(wisaacson@bsfllp.com)

BOIES, SCHILLER & FLEXNER LLP

5301 Wisconsin Ave, NW

Washington, DC 20015

Telephone: (202) 237-2727

Fax: (202) 237-6131

RICHARD J. POCKER #3568

(rpocker@bsfllp.com)

BOIES, SCHILLER & FLEXNER LLP

300 South Fourth Street, Suite 800

Las Vegas, NV 89101

Telephone: (702) 382 7300

Fax: (702) 382 2755

DONALD J. CAMPBELL #1216

(djcc@campbellandwilliams.com)

J. COLBY WILLIAMS #5549

(jcw@campbellandwilliams.com)

CAMPBELL & WILLIAMS

700 South 7th Street

Las Vegas, Nevada 89101

Telephone: (702) 382-5222

Fax: (702) 382-0540

*Attorneys for Defendant Zuffa, LLC, d/b/a
Ultimate Fighting Championship and UFC
Attorneys of Record for Defendant Zuffa,
LLC, d/b/a Ultimate Fighting Championship
and UFC*

jdavis@saverilawfirm.com
mweiler@saverilawfirm.com
apurdy@saverilawfirm.com
krayhill@saverilawfirm.com

WARNER ANGLE HALLAM JACKSON &
FORMANEK PLC
Robert C. Maysey
Jerome K. Elwell
2555 E. Camelback Road, Suite 800
Phoenix, AZ 85016
Telephone: (602) 264-7101/Fax: (602) 234-0419
rmaysey@warnerangle.com
jelwell@warnerangle.com

LAW OFFICE OF FREDERICK S. SCHWARTZ
Frederick S. Schwartz
15303 Ventura Boulevard, #1040
Sherman Oaks, CA 91403
Telephone: (818) 986-2407/Fax: (818) 995-4124
fred@fredschwartzlaw.com

SPECTOR ROSEMAN KODROFF & WILLIS,
P.C.
Eugene A. Spector
Jeffrey J. Corrigan
Jay S. Cohen
William G. Caldes
1818 Market Street – Suite 2500
Philadelphia, PA 19103
Telephone: (215) 496-0300/Fax: (215) 496-6611
espector@srkw-law.com
jcorrigan@srkw-law.com
jcohen@srkw-law.com
wcaldes@srkw-law.com

*Attorneys for Individual and Representative
Plaintiffs Cung Le, Nathan Quarry, Jon Fitch,
Luis Javier Vazquez, Dennis Lloyd Hallman,
Brandon Vera, Pablo Garza, Gabe Ruediger,
Mac Danzig, Kyle Kingsbury, and Darren
Uyenoyama*

ORDER

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED:_____

ATTESTATION OF FILER

The signatories to this document are myself and John F. Cove, Jr., and I have obtained Mr. Cove's concurrence to file this document on his behalf.

Dated: October 21, 2015

BERGER & MONTAGUE, P.C.

By: /s/ Michael Dell'Angelo
Michael Dell'Angelo
BERGER & MONTAGUE, P.C.
1622 Locust Street
Philadelphia, PA 19103
Telephone: (215) 875-3000
Fax: (215) 875-4604
mdellangelo@bm.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that service of the foregoing **STIPULATION TO FILE A CONSOLIDATED AMENDED COMPLAINT AND TO EXTEND DEFENDANT ZUFFA, LLC'S DEADLINE TO ANSWER PLAINTIFFS' CONSOLIDATED AMENDED COMPLAINT ACCORDINGLY** was served on October 21, 2015 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Michael Dell' Angelo